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November 13, 2001

**PUBLIC DOCUMENT**

**VIA E-MAIL**

Ms. Gloria Blue  
Executive Secretary  
TPSC, Office of the USTR  
600 17<sup>th</sup> Street, NW  
Washington, DC 20508

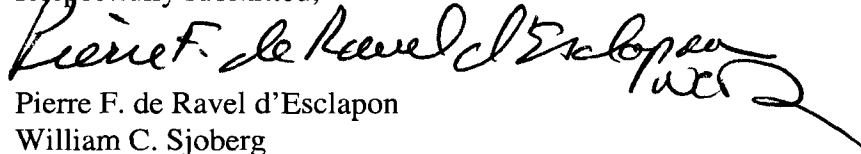
Re: Request for Exclusion from any Remedies Imposed Pursuant to the  
Section 201 Investigation of Certain Steel Products – Circular Discs  
of High-Speed Steel

Dear Ms. Blue:

On behalf of our client, the ERAMET Group and its affiliate, Erasteel Inc., a U.S. producer and importer of high-speed steel, we hereby attach Erasteel's request that circular discs of high-speed steel be excluded from any remedies imposed pursuant to the Section 201 steel investigation of certain steel. As set forth in the attachment, such products are not produced in the United States and any remedies imposed would most certainly injure the U.S. industries that are dependent on imports of circular discs of high-speed steel for use as inputs in their production process.

Please do not hesitate to contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,

  
Pierre F. de Ravel d'Esclapon  
William C. Sjoberg

Attachment

**REQUEST FOR EXCLUSION FROM ANY REMEDIES IMPOSED PURSUANT  
TO THE SECTION 201 INVESTIGATION OF CERTAIN STEEL PRODUCTS**

**CIRCULAR DISCS OF HIGH-SPEED STEEL**

- a. **Commercial Name:** Circular Discs of High-Speed Steel.

**Grades:** AISI M2 (HS 6-5-2), AISI M35 (HS 6-5-2-5), and ASP 2023 (HS 6-5-3) and ASP 2053.

**HTS No.:** 7225.20.2000

- b. **Description:** Circular discs of high-speed steel are made from sheet of high-speed steel and used to produce circular saws and knives. The diameter of the discs ranges between .787 – 39.37 in. The thickness of the discs range between 0.028 – 0.787 in.

- c. **Basis for Requesting Exclusion:** To the best of Erasteel Inc.'s knowledge, there is no U.S. production of circular discs of high-speed steel.

- d. **Names and Locations of Any Producers, in the United States and foreign countries, of the Product:**

<u>Name</u>	<u>Location</u>
Erasteel Commentry*	France
Nachi	Japan
Lohmann	Germany
Hitachi	Japan
Nachi	Japan
Boher/Uddeholm	Austria

\* member of the Eramet Group

- e. **Total U.S. Consumption of the Product by Quantity (short tons) and Value (000s) for Each Year 1996 to 2000 and Projected Annual Consumption for Each Year from 2001 to 2005:**

	1996	1997	1998	1999	2000
QTY.	18	20	15	11	11
VAL.	250	280	175	200	185

	2001	2002	2003	2004	2005
QTY.	10	12	13	14	15
VAL.	170	200	220	235	250

**Basis for the projections:** Marketing analysis and knowledge of the industry.

**f. Total U.S. Production of the Product for Each Year from 1996 to 2000:**

	1996	1997	1998	1999	2000
QTY.	0.00	0.00	0.00	0.00	0.00
VAL.	0.00	0.00	0.00	0.00	0.00

**g. The Identity of Any U.S.-Produced Substitute for the Product, Total U.S. Production of the Substitute for Each Year 1996 to 2000 and the Names of any U.S. Producers of the Substitute:** There is no U.S.-produced substitute for circular discs of high-speed steel.